

CITY OF SAN ANTONIO, TX
EX PARTE IN FCC DN 06-229

On behalf of the San Antonio Urban Area Security Initiative Region (“UASI Region”), San Antonio seeks an expedited waiver to allow for early construction and deployment of an interoperable 700 MHz broadband public safety network to serve the San Antonio UASI Region.

I. The San Antonio UASI Region.

- Encompasses a population of approximately 1.8 million (1.5 million in San Antonio and Bexar County). San Antonio is the nation’s 7th largest city.
- Home to 5 military bases.
- San Antonio is an extension of the State of Texas Operation Center and has been designated as the evacuation and logistic hub for the State of Texas.
- The San Antonio UASI is home to several critical telecommunications networks, including the 911 Tandem that supports 911 service throughout all of South Texas.
- The UASI must build and provide interoperable public safety communications network for state and federal authorities that stage in the San Antonio areas for natural disasters.

II. Early 700 MHz Broadband Public Safety Deployment Is Needed in the San Antonio UASI Region.

- A. The San Antonio UASI Region currently lacks sufficient public safety spectrum for a broadband public safety system.
- San Antonio and Bexar County currently share a 800 MHz system.
- B. Along with multijurisdictional partners such as the City of Austin, Coastal Plains Area, Lower Colorado River Authority (“LCRA”), various public universities, independent school districts, and state and federal agencies and other municipalities, San Antonio has been proceeding to implement a P25 700 MHz radio layer to provide an interoperable system to provide voice communications for day-to-day and emergency events.
- The larger goal is an interoperable 700 MHz broadband system for every jurisdiction in the region and to federal agencies and to adjacent jurisdictions during state and federal declared emergencies.
 - The San Antonio UASI wishes to provide Region Computer Aided Dispatch to facilitate communications among all in-region jurisdictions and all visiting jurisdictions.

- C. The proposed 700 MHz broadband system will be interoperable with other systems to create a “system of systems” approach to a regional, and ultimately a nationwide, interoperable 700 MHz public safety network.
- D. This will save considerable costs for the San Antonio UASI and for all other users via scale economies and standardization. Further cost-savings will result from shared infrastructure. San Antonio, for example, could share switches with the City of Austin and the LCRA.
- E. The costs of deployment could be reduced by taking advantage of the current deployment of the P25 700 MHz voice system. But this cost-savings opportunity will be lost unless the requested waiver is granted, so that the San Antonio UASI can proceed with 700 MHz broadband public safety system deployment in conjunction with the P25 700 MHz deployment.

III. Grant of the Waiver is in the Public Interest.

- A. We propose that the FCC allow for a “sub-license” of the PSST 700 MHz license for the San Antonio UASI Region or, alternatively, that the FCC permit the San Antonio UASI to enter into a long-term lease of PSST license capacity in the region.
- B. San Antonio’s proposed 700 MHz public safety broadband system will be fully interoperable with the nationwide system ultimately implemented by the FCC.
- C. The D-Block auction/licensing process has been continually delayed, with no clear end in sight. Meanwhile, the San Antonio UASI is now ready, willing and able to proceed with deployment of an urgently-needed 700 MHz interoperable broadband public safety system.
 - Further delay will substantially increase the cost of 700 MHz broadband public safety system deployment in the San Antonio UASI.
 - Further delay will also indefinitely expose the vitally important agencies in the region, both federal and state, to the critical broadband public safety capabilities that are needed to confront a national disaster and other threats posed to the region.
- D. San Antonio’s waiver petition does not overlap with any of the other pending 700 MHz waiver petitions.